IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

OurPet's Company, Plaintiff, v. **Arjan Impex**, Defendant.	)))))))))	Case No. 1:13-cv-2550-PAG Judge Gaughan **PLAINTIFF'S ANSWER TO THE DEFENDANT'S COUNTERCLAIM**

NOW COMES the Plaintiff, *OurPet's Company*, and pursuant to Fed. R. Civ. P. 12(a)(1)(B), Plaintiff hereby submits its Answer to the Defendant's Counterclaim as follows:

1. Plaintiff admits Paragraph Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, and 12 of the Defendant's Counterclaim.
2. Plaintiff denies Paragraph No. 13 of the Defendant's Counterclaim.
3. Plaintiff incorporates by reference Paragraph Nos. 1 – 13 as though fully restated herein.
4. Plaintiff denies Paragraph Nos. 15, 16, and 17 of the Defendant's Counterclaim.
5. Plaintiff incorporates by reference Paragraph Nos. 1 – 17 as though fully restated herein.
6. Plaintiff denies Paragraph Nos. 19, 20, and 21 of the Defendant's Counterclaim.
7. Plaintiff incorporates by reference Paragraph Nos. 1 – 21 as though fully restated herein.
8. Plaintiff denies Paragraph Nos. 23, 24, and 25 of the Defendant's Counterclaim.
9. Plaintiff incorporates by reference Paragraph Nos. 1 – 25 as though fully restated herein.
10. Plaintiff denies Paragraph Nos. 27, 28, and 29 of the Defendant's Counterclaim.

Affirmative Defenses

1. Defendant's Counterclaim fails to state a claim upon which relief can be granted.
2. Defendant's products infringe upon Plaintiff's asserted patents.
3. The Plaintiff's '589 and '253 patents are valid and enforceable.

Wherefore, Plaintiff requests the Court to enter an Order in favor of the Plaintiff on all of the Plaintiff's claims as stated in Plaintiff's Complaint, and enter an Order in favor of the Plaintiff and against the Defendant on all of the Defendant's Counterclaims, and dismiss the Defendant's Counterclaims with prejudice, and award Plaintiff the relief so requested in its Complaint.

Plaintiff further requests a trial by jury on all issues so triable.

Most Respectfully Submitted,

/s/ David A. Welling

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CERTIFICATE OF SERVICE

This is to certify that on the date electronically time-stamped above that this document was transmitted via the Court's electronic filing system to all parties of record.

___/s/ David A. Welling______________
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Counsel for the Plaintiff